

Community Services Block Grant (CSBG) Model State Plan

Table of Contents

SECTION 1 CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter	2
SECTION 2 State Legislation and Regulation.....	4
SECTION 3 State Plan Development and Statewide Goals.....	5
SECTION 4 Hearing Requirements.....	7
SECTION 5 CSBG Eligible Entities	8
SECTION 6 Organizational Standards for Eligible Entities.....	10
SECTION 7 State Use of Funds	12
SECTION 8 State Training and Technical Assistance.....	15
SECTION 9 State Linkages and Communication.....	17
SECTION 10 Monitoring, Corrective Action, and Fiscal Controls.....	22
SECTION 11 Eligible Entity Tripartite Board.....	27
SECTION 12 Individual and Community Income Eligibility Requirements.....	28
SECTION 13 Results Oriented Management and Accountability (ROMA) System.....	29
SECTION 14: CSBG Programmatic Assurances and Information Narrative	31

SECTION 1 CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

1.1. Identify whether this is a One-Year or a Two-Year Plan: Two-Year

1.1a. Provide the federal fiscal years this plan covers: 2021/2022

1.2. Lead Agency: Update the following information in relation to the lead agency designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act.

- Has information in regards to the state lead agency has changed since the last submission of the state plan? Yes: Authorized Official, Address
- 1.2a Lead Agency: Indiana Housing and Community Development Authority
- 1.2b Cabinet of Administrative Department of this lead agency:
 - Community Affairs Department
 - Community Services Department
 - Governor's Office
 - Health Department
 - Housing Department
 - Human Services Department
 - Social Services Department
 - Other, describe: [Narrative, 100 characters]
- 1.2c Cabinet or Administrative Department Name: Community Programs
- 1.2d Authorized Official: Emily Krauser, Director of Community Programs
- 1.2e Street Address: 30 S. Meridian St, Suite 900
- 1.2f City: Indianapolis
- 1.2g State: IN
- 1.2h ZIP: 46204
- 1.2i Telephone and extension: (317) 232-7777
- 1.2j Fax: (317) 232-7778
- 1.2k Email Address: csbg@ihcda.in.gov
- 1.2l Lead Agency Website: https://www.in.gov/ihcda/

1.3 Designation Letter: attached

1.4. CSBG Point of Contact: provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.

- Has Information in regards to the state point of contact has changed since the last submission of the state plan? Yes: Point of Contact, phone number, email address
- 1.2a Agency Name: Indiana Housing and Community Development Authority
- 1.2b Point of Contact: Veronica Watson, Community Programs Manager - CSBG
- 1.2c Street Address: 30 S. Meridian St, Suite 900
- 1.2d City: Indianapolis
- 1.2e State: IN
- 1.2f ZIP: 46204

- 1.2g Telephone and extension: (317) 232-7777
- 1.2h Fax: (317) 232-7778
- 1.2i Email Address: csbg@ihcda.in.gov
- 1.2j Lead Agency Website: https://www.in.gov/ihcda/

1.5. Provide the following information in relation to the State Community Action Association.

- There is currently a state Community Action Association within the state. Yes
- Has Information in regards to the state Community Action Association has changed since the last submission of the state plan? No
- 1.5a. Agency Name: Indiana Community Action Association
- 1.5b. Executive Director or Point of Contact: Ed Gerardo, Executive Director
- 1.5c. Street Address: 1845 West 18th Street
- 1.5d. City: Indianapolis
- 1.5e. State: IN
- 1.5f. Zip: 46202
- 1.5g. Telephone number: (317) 638 - 4232
- 1.5h. Fax number: (317) 634 - 7947
- 1.5i. Email Address: egerardo@incap.org
- 1.5j. State Association Website: http://www.incap.org/
- 1.5k. State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead: No

SECTION 2 State Legislation and Regulation

2.1 CSBG State Legislation. State has a statute authorizing CSBG: Yes

2.2 CSBG State Regulation: State has regulations for CSBG: No

2.3. Legislation/Regulation Document: Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Item 2.1. and/or Item 2.2:

- Community Action Agencies: <http://iga.in.gov/legislative/laws/2020/ic/titles/012/#12-14-23>
- Lt. Governor Administering CSBG: <http://iga.in.gov/legislative/laws/2020/ic/titles/004/#4-4-33>

2.4a. Authorizing Legislation. State legislature enacts authorizing legislation or amendments to an existing authorizing statute, last federal fiscal year: No

2.4b. Regulation Amendments. State established or amended regulations for CSBG last federal fiscal year: No

2.4c. Designation: State statutory or regulatory authority designates the bureau, division, or office in the state government that is to be the state administering agency: Yes

SECTION 3 State Plan Development and Statewide Goals

3.1. CSBG Lead Agency Mission and Responsibilities: Briefly describe the mission and responsibilities of the state agency that serves as the CSBG lead agency.

- 2020 Response: IHCD's mission is to provide housing opportunities, promote self-sufficiency, and strengthen communities across Indiana. IHCD maintains oversight of the Indiana CSBG funding through approved distribution formulas and reimbursement procedures, as well as monitoring of the Community Action Agencies on compliance with both State and Federal Standards.

3.2 Statewide goals: Describe the state's CSBG-specific goals for state administration of CSBG under this State Plan.

- 2020 Response: IHCD will continue to improve communication between eligible entities and the State Office, as measured by the ASCI. Strategies to accomplish this will include IHCD leading training sessions and providing regular program updates via e-newsletters and/or conference calls. IHCD will also continue help eligible entities improve their Comprehensive Administrative Review (CAR) scores for monitoring. This will be accomplished by having IHCD lead training sessions on the monitoring process, engaging a contractor to develop an "Intro to CSBG and Community Action" training series for new staff in the network, and using discretionary funds for agencies to use for direct T&TA with contractors to work on organizational standard issues. Another goal for the next two years will be to improve awareness of community action agencies and their work across the state. IHCD plans to do this by creating and releasing marketing materials and press releases in various media markets and by having Community Action Month officially recognized by the Governor's and/or Lt. Governor's Offices. Finally, IHCD plans to encourage Two-Generation (2Gen) strategies within community action programs, by using discretionary funds to support 2Gen training and grants.

3.3. State Plan Development: Indicate the information and input the state accessed to develop this State Plan.

- 3.3a. Analysis of state-level tools [Check all that applies and narrative where applicable]
 - State Performance Indicators and/or National Performance Indicators (NPIs)
 - U.S. Census data
 - State performance management data (e.g., accountability measures, ASCI survey information, and/or other information from annual reports)
 - Monitoring Visits/Assessments
 - Tools not identified above (specify) [Narrative, 500 characters]
- 3.3b. Analysis of local-level tools [Check all that applies and narrative where applicable]
 - Eligible entity community needs assessments
 - Eligible entity community action plans
 - Public Hearings/Workshops
 - Tools not identified above (e.g., state required reports) [specify] [Narrative, 500 characters]

- 3.3c. Consultation with [Check all that applies and narrative where applicable]
 - Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
 - State Association
 - National Association for State Community Services Programs (NASCSPP)
 - Community Action Partnership (The Partnership)
 - Community Action Program Legal Services (CAPLAW)
 - CSBG Tribal Training and Technical Assistance (T/TA) provider
 - Regional Performance Innovation Consortium (RPIC)
 - Association for Nationally Certified ROMA Trainers (ANCRT)
 - Federal CSBG Office
 - Organizations not identified above (specify) [Narrative, 500 characters]

3.4a. Describe the specific steps the state took in developing the State Plan to involve the eligible entities. [Narrative, 3000 Characters] Note: This information is associated with State Accountability Measures 1Sa(ii) and may pre-populate the state's annual report form.

- 2020 Response: *Will be finalized after public comment period*

3.4b. Performance Management Adjustment: Describe how the state has adjusted its State Plan development procedures under this State Plan, as compared to previous plans, in order to 1) encourage eligible entity participation and 2) ensure the State Plan reflects input from eligible entities?

- 2020 Response: *Will be finalized after public comment period*

3.5. Eligible Entity Overall Satisfaction: Provide the state's target for eligible entity Overall Satisfaction during the performance period.

- Year One: 77
- Year Two: 80

SECTION 4 Hearing Requirements

4.1. Public Inspection: Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the Act.

- 2020 Response: *Will be finalized after public comment period*

4.2. Public Notice/Hearing: Describe how the state ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act. [Narrative, 2500 Characters]

- 2020 Response: *Will be finalized after public comment period*

4.3 Public and Legislative Hearings: In the table below, specify the date(s) and location(s) of the public and legislative hearing(s) held by the designated lead agency for this State Plan, as required under Section 676(a)(2)(B) and Section 676(a)(3) of the Act.

- 2020 Response: *Will be finalized after public comment period*

4.4. Attach supporting documentation or a hyperlink for the public and legislative hearings. [Attach supporting documentation or provide a hyperlink(s), 500 characters]

- 2020 Response: *Will be finalized after public comment period*

SECTION 5 CSBG Eligible Entities

5.1 CSBG Eligible Entities:

#	CSBG Eligible Entity	Geographical Area Served by county (Provide all counties)	Public or Nonprofit	Type of Entity [choose all that apply]
1	Area IV Agency on Aging and Community Programs, Inc.	Carrol, Clinton, Tippecanoe, White	Non-Profit	Community Action Agency
2	Area Five Agency on Aging and Community Services, Inc.	Cass, Howard, Miami, Tipton, Wabash	Non-Profit	Community Action Agency
3	Community Action of Greater Indianapolis, Inc.	Boone, Hamilton, Hendricks, Marion	Non-Profit	Community Action Agency
4	Community Action of Northeast Indiana, Inc.	Allen, DeKalb, LaGrange, Noble, Steuben, Whitley	Non-Profit	Community Action Agency
5	Community Action Program of Evansville and Vanderburgh County, Inc.	Gibson, Posey, Vanderburg	Non-Profit	Community Action Agency
6	Community Action of Southern Indiana, Inc.	Clark, Floyd, Harrison	Non-Profit	Community Action Agency
7	Community and Family Services, Inc.	Adams, Blackford, Huntington, Jay, Randolph, Wells	Non-Profit	Community Action Agency
8	Community Action Program, Inc. of Western Indiana	Benton, Fountain, Montgomery, Parke, Vermillion, Warren	Non-Profit	Community Action Agency
9	Human Services, Inc.	Bartholomew, Decatur, Jackson, Johnson, Shelby	Non-Profit	Community Action Agency
10	Hoosier Uplands Economic Development Corp.	Lawrence, Martin, Orange, Washington	Non-Profit	Community Action Agency
11	Interlocal Community Action Program, Inc.	Delaware, Fayette, Hancock, Henry, Rush, Wayne	Non-Profit	Community Action Agency
12	Job Source - Central Indiana Community Action Program	Grant, Madison	Public	Community Action Agency

13	Lincoln Hills Development Corporation	Crawford, Perry, Spencer	Non-Profit	Community Action Agency
14	North Central Community Action Agencies, Inc.	LaPorte, Pulaski, Starke	Non-Profit	Community Action Agency
15	Northwest Indiana Community Action Corp.	Jasper, Lake, Newton, Porter	Non-Profit	Community Action Agency
16	Ohio Valley Opportunities Inc.	Jefferson, Jennings, Scott	Non-Profit	Community Action Agency
17	PACE Community Action Agency, Inc.	Daviess, Greene, Knox, Sullivan	Non-Profit	Community Action Agency
18	REAL Services, Inc.	Elkart, Fulton, Kosciusko, Marshall, St. Joseph	Non-Profit	Community Action Agency
19	South Central Community Action Program, Inc.	Brown, Monroe, Morgan, Owen	Non-Profit	Community Action Agency
20	Southeastern Indiana Economic Opportunity Corp.	Dearborn, Franklin, Ohio, Ripley, Switzerland, Union	Non-Profit	Community Action Agency
21	Dubois-Pike-Warrick Economic Opportunity	Dubois, Pike, Warrick	Non-Profit	Community Action Agency
22	Western Indiana Community Action Agency	Clay, Putnam, Vigo	Non-Profit	Community Action Agency

5.2 Total number of eligible entities: 22

5.3. Changes to Eligible Entities List: Within the tables below, describe any changes that have occurred to the Eligible Entities within the state since the last federal fiscal Year (FFY), as applicable. One or more of the following changes were made to the eligible entity list: [Check all that apply].

- Designation and/or Re-Designation
- De-designations and/or Voluntary Relinquishments
- Mergers
- No Changes to Eligible Entities List

SECTION 6 Organizational Standards for Eligible Entities

6.1 Choice of Standards: Confirm whether the state will implement the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138) or an alternative set during the federal fiscal year(s) of this planning period

- COE CSBG Organizational Standards
- Modified version of COE CSBG Organizational Standards
- Alternative set of Organizational Standards

6.1a Modified Organizational Standards: In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale.

- 2020 Response: Indiana uses the COE-developed organizational standards, in addition to state standards that reflect requirements in state legislation and State Office policies. In addition to the COE standards, IHCD monitors CAA compliance with 40 state standards. Please see the attached 2020 CAR Tool for the list and explanations for federal and state standards that IHCD monitors.

6.2 Implementation: Check the box that best describes how the state officially adopt(ed) organizational standards for eligible entities in the state in a manner consistent with the state's administrative procedures act. If "Other" is selected, provide a timeline and additional information, as necessary. [Check all that apply and narrative where applicable]

- Regulation
- Policy
- Contracts with eligible entities

6.3 Organizational Standards Assessment: Describe how the state assess eligible entities against organizational standards this federal fiscal year(s). [Check all that apply.]

- Peer-to-peer review (with validation by the State or state-authorized third party)
- Self-assessment (with validation by the state or state-authorized third party)
- Self-assessment/peer review with state risk analysis
- State-authorized third-party validation
- Regular, on-site CSBG monitoring
- Other

6.3a. Assessment Process: Describe the planned assessment process.

- 2020 Response: Indiana conducts a CSBG Comprehensive Administrative Review (CAR) monitoring at a minimum of every 3 years for each of the CAAs. Indiana utilizes a CAR Monitoring Tool that includes the CSBG organizational standards as well as state standards that each CAA is reviewed against. Any Additional monitoring review that are needed or required as a result of special CSBG funding allocations, such as for natural disaster or emergency, are completed as needed. Each monitoring begins with an Entrance Conference for agency leadership staff outlining the monitoring event. Later, additional interviews are conducted with governing board members and agency

leadership staff such as the Executive Director, Finance Manager, Human Resource Manager and CSBG Manager. Exit conferences are held with Executive Director and appropriate leadership staff to inform them of the preliminary results including required actions and best practice recommendations. This concludes the compliance monitoring phase of the monitoring event. A CSBG CAR Monitoring Report is distributed within 30 calendar days from the exit conference. It contains the monitoring results as well as identifies which organizational standards were met and provides an overall organizational standard score. The agencies are given 10 calendar days to respond by either accepting or informally appealing the report. If an agreement is not reached, then the agency can formally appeal items contained within the report. Once all items have been agreed upon, the agency will make corrective action to the identified deficiencies. IHCDCA makes every effort to work with CAAs in the event there are challenges with responding to the identified deficiencies. If a response is received that is incomplete or unacceptable, a letter is sent outlining the unacceptable portions and providing detailed guidance to complete their response.

Agencies are also annually monitored through the information submitted in their CSBG Community Action Annual Plan, which includes an organizational standard self-assessment. Furthermore, an annual risk assessment is conducted that may result in interim monitoring's if a high risk is determined. Other major program reviews are also conducted within IHCDCA's Community Programs Division, to assess the status of the agency's administration of those programs. The results of those reviews, in conjunction with the risk assessment, may trigger an interim monitoring such as a desktop review. No peer review is conducted, unless opted into by the CAA. When a new agency is designated, IHCDCA will conduct an onsite review at the end of the entity's first year of service. An agency who hires a new executive director may also receive an onsite review at the end of their first year of service, if a normal review is not scheduled. Follow-up reviews including progress updates and/or return visits occur, when appropriate, if there is less than favorable progress towards achieving compliance in outcomes or goals established during the onsite visit. Other reviews are conducted, as appropriate, including reviews of CAAs with programs that have had other federal, state or local grants terminated.

If IHCDCA implements any material procedure changes to our monitoring plan, we will submit a State Plan revision.

6.4 Eligible Entity Exemptions: Will the state make exceptions in applying the organizational standards for certain eligible entities due to special circumstances or organizational characteristics (as described in IM 138)? No

6.5 Performance Target: Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for FFY(S) for this planning period

- Year 1: 35%
- Year 2: 40%

SECTION 7 State Use of Funds

7.1 Formula: Select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities.

- Historic
- Base + Formula
- Formula Alone
- Formula with Variables
- Hold Harmless + Formula
- Other

7.1a. Formula Description: Describe the current practice for allocating CSBG funds to eligible entities.

- 2020 Response: Using Indiana's funding formula, the majority of the allocation (65%) is determined based on the % of individuals at or below 125% of poverty in the service area of the counties. The remaining amount (35%) is split between a \$50,000 base for each agency, and an amount based on the number of counties each agency serves.

7.1b. Statue: Does a state statutory or regulatory authority specify the formula for allocating "not less than 90 percent" funds among eligible entities? No

7.2 Planned Allocation: Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and "not less than of 90 percent funds" as described under Section 675C(a) of the CSBG Act. In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal year(s) covered by this plan.

- 2020 Response: Will use same amounts as 2020 funding.

7.3. Distribution Process: Describe the specific steps in the state's process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; include information about state legislative approval or other types of administrative approval (such as approval by a board or commission). [Narrative, 5000 characters]

- 2020 Response: During 2021/2022 program years, the Community Services Block Grant funds will be allocated as follows: CAAs receive 90%, the State Office Administration allocation is 5%, and the remaining 5% is used for discretionary purposes. Step 1 (1 day): Once the award letter is received from HHS, the CSBG Program Manager runs the total amount through an allocation table, which determines the 90%, 5% and 5% amounts. Using the 90% amount, the table then calculates the amount each CAA receives, using the formula described above. Step 2 (1 day): The CSBG Analyst performs a quality assurance review of the amounts calculated. Step 3 (3 days): the final amounts are emailed to IHCD's Executive Director, to approve disbursement. Step 4 (1 week): Once approval is received from IHCD's Executive Director, the Analyst finalizes the award for each agency and emails it out for e-signatures.

7.4. Distribution Timeframe: Does the state plan to make funds available to eligible entities Section 7 16 no later than 30 calendar days after OCS distributes the federal award? Y Yes N No

7.4a. Distribution Consistency: If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption.

- 2020 Response: While IHCDCA usually receives CSBG funds from HHS in the fall of the federal fiscal year, the CSBG program year does not start until the following January 1 in Indiana. When IHCDCA receives those funds, program staff immediately set-up and send out contracts to eligible agencies, and those contracts are normally finalized within 30 days of the IHCDCA receiving funds from HHS. However, those contracts do not start until January 1 of the state program year, which can be one to three months after the funds are originally received. Despite this delay in the contract starting, agencies still have access to each round of funding for 12 months before the next round of funding is available. Because Indiana still follows a 12-month cycle (with carryover allowed until the end of the next fiscal year), there is no interruption in funding; we would work with agencies if they ran out of funds prior to January 1, but so far that has not happened. After January 1, any CSBG funds received from HHS are made immediately available to agencies.

7.5. Performance Management Adjustment: Describe the state's strategy for improving grant and/or contract administration procedures under this State Plan as compared to past plans. Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail.

- 2020 Response: Starting with FFY 2020 funds, contracts with CAA's were made on two-year terms, negating the need for amendments or separate contracts for carryover, as had been used in the past. The budget form was also simplified, taking budget line items from four (admin, direct services, equipment and subcontracts) to two (admin and direct services), thereby reducing the need for budget modifications. Both changes have decreased the amount of paperwork that has to be completed between CAAs and IHCDCA.

7.6. Allocated Funds: Specify the percentage of your CSBG planned allocation for administrative activities for the FFY(s) covered by this State plan. 5%

7.7. State Staff: Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFY(s) covered by this State Plan: 40

7.8. State FTEs: Provide the number of state Full Time Equivalents (FTEs) to be funded with CSBG funds for the FFY(s) covered by this State Plan 5

7.9 Use of Remainder/Discretionary Funds (See Section 675C(b)(1) of the CSBG Act) 2020 Response:

- Training/technical assistance to eligible entities: \$180,000
- Coordination of state-operated programs and/or local programs: \$0
- Statewide coordination and communication among eligible entities: \$50,000

- Analysis of distribution of CSBG funds to determine if targeting greatest need: \$0
- Asset-building programs: \$0
- Innovative programs/activities by eligible entities or other neighborhood groups: \$200,000
- State charity tax credits: \$0
- Other activities: \$100,000

7.10. Remainder/Discretionary Funds Partnerships: Select the types of organizations, if any, the State Plans to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9. [Check all that apply and narrative where applicable]

- The state directly carries out all activities (No Partnerships)
- The state partially carries out some activities
- CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds): 5
- Other community-based organizations
- State Community Action association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- Individual consultant(s)
- Tribes and Tribal Organizations
- Other

7.11. Performance Management Adjustment: Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [Narrative, 5000 Characters]

- 2020 Response: IHCDCA plans to set aside a specific amount of training and technical assistance funds for agencies to use for ad hoc T&TA, to help them address any organizational standard deficiencies; this change from previous years was made based on requests from multiple CAAs, either directly or through ACSI comments. IHCDCA also plans to set aside funds specifically for statewide coordination and communication. In the last year, more effort has been made by IHCDCA and the State Association to bring CAA staff together to discuss specific topics and exchange best practices, including fiscal practices and responses to COVID-19; those efforts have received very positive feedback, so IHCDCA plans to expand that outreach and communication work.

SECTION 8 State Training and Technical Assistance

8.1 Describe the State's plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan. 8.1b. Training and Technical Assistance Collaboration: send to agencies question.

- 2020 Response:
 - FFY1 Q1 (Training): *The last of INCAA's 2020 training sessions, listed individually once they are finalized.*
 - FFY1 and FFY2 Q1 (Training): Community Action Plan training, led by IHCD
 - FFY1 and FFY2 Q2 (Training): CAR training, led by IHCD
 - FFY1 and FFY2 Q2 (Training): Annual Report training, led by IHCD
 - Ongoing/Multiple Quarters (Technical Assistance): Correcting Significant Deficiencies Among Eligible Entities
 - Ongoing/Multiple Quarters (Training): Intro to CSBG training series
 - Ongoing/Multiple Quarter (Training): Some combination of topics, as outlined in the annual training contract
 - Ongoing/Multiple Quarter (Technical Assistance): Other – monthly or quarterly round tables for fiscal, HR and program staff
 - Ongoing/Multiple Quarter (Technical Assistance): Other – monthly or quarterly calls with other state stakeholders, to learn about their programs and how CAAs can partner. Examples include the State Health Department, DWD, etc.

8.1b. Training and Technical Assistance Collaboration: Describe how the state will collaborate with the State Association and other stakeholders in the planning and delivery of training and technical assistance.

- 2020 Response: As a part of the annual Community Action Plan, agencies suggest topics for trainings that IHCD should host or fund. That list of topics is used along with feedback that the State Association gathers from individual agencies and from committees, as well as State monitoring results, to plan a series of trainings each year. Those trainings are delivered by IHCD, IN-CAA and other consultants, including national partners (NASCS, CAPLAW, etc.). IHCD plans to work more closely with other state departments in the 2021 and 2022 program years to provide training and technical assistance on relevant state programs and on how to form linkages with other state-funded entities.

8.2. TAPs and QIPs: Does the state have Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) in place for all eligible entities with unmet organizational standards, if appropriate? Yes

8.2a Address Unmet Organizational Standards: Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards.

- 2020 Response: Each year, IHCD uses CSBG discretionary funds to support free trainings open to the entire network; many of the training topics are inspired by trends in monitoring, specifically by commonly unmet organizational standards. Often, by attending those trainings and updating documents or policies that are covered by the trainings, agencies are able to show that they have addressed the unmet standard. For

anything that is not covered by a statewide training, the CSBG Program Monitor works directly with each agency to ensure they complete and turn in necessary documents to show that they have addressed the unmet standard; this is done via monthly phone calls and regular emails, until the monitor determines the standard is met. For agencies with more difficult Organizational Standards deficiencies, funding will be provided for a consultant or similar direct support.

8.3. Training and Technical Assistance Organizations: Indicate the types of organizations through which the State Plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement. [Check all that apply.]

- CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds)
- Other community-based organizations
- State Community Action association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- Individual consultant(s)
- Tribes and Tribal Organizations
- Other

8.4. Performance Management Adjustment: Describe adjustments the state made to the training and technical assistance plan under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [Narrative, 2500 Characters]

- 2020 Response: CAAs often request training or additional assistance on CSBG-specific reporting or monitoring; in response to those requests, IHCD has begun to host more of its own in-person training sessions and webinars, to cover topics such as CAR Monitoring, the Community Action Plan and the Annual Report. IHCD also often gets requests for an "Intro to CSBG" training or resources for new CAA staff. Nothing like that currently exists in Indiana, so IHCD plans to start building out a series of webinars, in-person trainings and resources that could address that need over the next two years. Finally, CAAs have also requested hearing from other state-level agencies, to learn more about other programs they could partner with locally; IHCD plans to invite agencies such as the State Health Department, Department of Workforce Development and the Indiana Broadband Office, to speak to CAAs at various times throughout the year.

SECTION 9 State Linkages and Communication

9.1 State Linkages and Coordination at the State Level: Describe the linkages and coordination at the state level that the state intends to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Describe additional information as needed. [Check all that apply from the list below]

- State Low Income Home Energy Assistance Program (LIHEAP) office
- State Weatherization office
- State Temporary Assistance for Needy Families (TANF) office
- State Head Start office
- State public health office
- State education department
- State Workforce Innovation and Opportunity Act (WIOA) agency
- State budget office
- Supplemental Nutrition Assistance Program (SNAP)
- State child welfare office
- State housing office
- Other

9.2 State Linkages and Coordination at the Local Level: Describe the linkages and coordination at the local level that the state intends to create or maintain with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by assurances under Section 676(b)(5) – (6)). [Narrative, 5000 Characters]

- 2020 Response: IHCDCA plans to create linkages with other state agencies, such as the state Head Start Office, the Department of Workforce Development, the State Health Department, and others, to give CAAs better access to these agencies and the programs they manage. IHCDCA will continue regular communication with CAAs, in the form of e-newsletters and conference calls, to share news about state programs and initiatives that CAAs should be aware of.

9.3a. State Assurance of Eligible Entity Linkages and Coordination: Describe how the state will assure that eligible entities will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)). [Narrative, 5000 Characters]

- 2020 Response: As a part of the annual Community Action Plan, eligible entities must list and describe the partnerships they form in their communities, as well as the linkages they develop or maintain to address service gaps and to avoid duplication of services. IHCDCA reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity. Partnerships and linkages are also reviewed during onsite monitoring reviews; if any major gaps appear in those linkages, IHCDCA will work with an agency to develop new or more robust linkages.

9.3b How agencies develop linkages to fill gaps in services: Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations.

- 2020 Response: CSBG Eligible Entities rely on their triennial community needs assessment, as well as their strategic planning processes to identify and plan to fill services gaps. Based on those processes, agencies develop new and/or strengthen current linkages between their own programs, and with the programs provided by other local organizations. In addition to their Needs Assessment, agencies use ongoing feedback from key stakeholders (clients, partners, board members, staff that sit on other agency boards and coalitions, etc.) to regularly evaluate and be responsive to gaps in services in their communities. At the individual level, many agencies use a Family Development Matrix or similar tool, to measure different areas of need for each client, and to connect that client with relevant resources and programs to meet those needs; this tool is often used in conjunction with case management or coaching. Most agencies also keep a service referral sheet on hand and ready to pass-out to clients, to help clients identify services within the agency or at partnering agencies that could be helpful.

9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities: Does the state intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)? ☒ Yes ☐ No 9.4b. Employment and Training Activities: If the state selected no under Item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the state and by eligible entities providing activities through the WIOA system. [Narrative, 5000 Characters]

- 2020 Response: These efforts in coordination of employment and training activities will be carried out by local agreements between the Community Action Agencies and the local Workforce Development Boards. IHCD is available to the Community Action Agencies for assistance in these negotiations.

9.5. Emergency Energy Crisis Intervention: Describe how the State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act). [Narrative, 5000 Characters]

- 2020 Response: IHCD administers The Low-Income Home Energy Assistance Program (LIHEAP) in Indiana. Funding is provided to local service providers (LSPs) for provision of both the Energy Assistance program (EAP) and the LIHEAP portion of the Weatherization Program (Wx); 20 of Indiana's 22 CSBG Eligible Entities administer the EAP program and a slightly different 20 administer the Wx program. EAP services include winter assistance and crisis benefits for heating, as well as leveraging when available. These agencies serve all 92 counties within the state. The LSPs work closely with utility companies and private vendors to serve those in need of energy assistance.

9.6. Faith-based Organizations, Charitable Groups, Community Organizations: Describe how the state will assure local eligible entities will coordinate and form partnerships with other

organizations, including faith-based organizations, charitable groups, and community organizations, according to the state's assurance under Section 676(b)(9) of the CSBG Act. [Narrative, 5000 characters]

- **2020 Response:** As a part of the annual Community Action Plan, eligible entities must list and describe the partnerships they form in their communities and indicate if those partnerships are with faith-based organizations, charitable groups, or community organizations. IHCD reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity. Partnerships and linkages are also reviewed during onsite monitoring reviews.

9.7 How agencies will coordinate CSBG funds with other public and private resources: Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources.9.8. Coordination among Eligible Entities and State Community Action Association: send to agencies question

- **2020 Response:** Most CSBG Eligible Entities combine CSBG funds with other federal, state and local funding to support their services. Many agencies also solicit private donations and in-kind services for further funding support. In a few cases, agencies subgrant CSBG funds to local partners who are able to provide certain services with either greater efficiency and/or at greater capacity than the agency could with their own available resources.

9.8. Coordination among Eligible Entities and State Community Action Association: Describe state activities for supporting coordination among the eligible entities and the state community action association.

- **2020 Response:** All of the CAAs in the State of Indiana choose to be members of the Indiana Community Action Association (IN-CAA). IN-CAA, who receives CSBG discretionary funding from IHCD to provide technical assistance, training, and resources to help CAAs increase network capacity. These resources must be made available to all CAAs that receive CSBG funds from IHCD, even if they choose not to be an IN-CAA member.

9.9 How State will communicate with agencies and INCAA (ACSI). In the table below, detail how the state intends to communicate with eligible entities, the state community action association, and other partners identified under this State Plan on the topics listed below. For any topic that is not applicable, select "Not Applicable" under Expected Frequency. **2020 Response:**

Upcoming Public and/or Legislative Hearings	As needed	Newsletter, meeting/presentations, email, website, public notice
State Plan Development	Biennial	Newsletter, meetings/presentations, email, website, webinar, public notice, hard/copies
Organizational Standards Progress	Annual	Meetings/Presentation, webinar

State Accountability Measures Progress	Biennial	Newsletter, Meetings/Presentation, email, webinar
Community Needs Assessments/Community Action Plans	Annual	Newsletter, meetings/presentations, email, website, webinar
State Monitoring Plans and Policies	Annual	Newsletter, meetings/presentations, email, website,
Training and Technical Assistance (T/TA) Plans	Biennial	Newsletter, meetings/presentations, email, website, webinar, public notice, hard/copies
ROMA and Performance Management	As needed	Newsletters, Meetings/Presentations, Email, Website, Webinar
State Interagency Coordination	As needed	Newsletters, meetings/presentations
CSBG Legislative/Programmatic Updates	As needed	Newsletters, Meetings/Presentations, Email, Website, Webinar
Tripartite Board Requirements	As needed	Newsletters, Meetings/Presentations, Email, Website, Webinar

9.10. Feedback to Eligible Entities and State Community Action Association: Describe how the state will provide information to local entities and State Community Action Associations regarding performance on State Accountability Measures. [Narrative, 5000 Characters]

- 2020 Response: Feedback from the State Accountability Measures will be emailed to the Executive Directors of CAAs within 30 days of receiving the report. In addition, IHCDCA attends all monthly INCAA Board Meetings and will provide additional updates and request additional feedback in that forum.

9.11. Performance Management Adjustment: Describe any adjustments the state made to the Communication Plan in this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [Narrative, 5000 Characters]

- 2020 Response: In the past, IHCDCA utilized the IN-CAA Board Meeting to provide insights into what is happening at the state level, as well as email to make specific announcements; both of those practices will continue, but IHCDCA has also begun sending its own regular e-newsletter, to share additional and regular information with CAAs about CSBG, LIHEAP and Weatherization. This new communication tool was started during the COVID-19 crisis, and received very positive feedback from agencies, so it will continue on a more permanent basis. Additionally, because CAAs have

requested additional information from IHCD A about CSBG-specific topics like monitoring and the Annual Report, IHCD A plans to host webinars and/or in-person trainings at least on an annual basis on those topics.

DRAFT

SECTION 10 Monitoring, Corrective Action, and Fiscal Controls

10.1 Specify the proposed schedule for planned monitoring visits including: full on-site reviews; on-site reviews of newly designated entities; follow-up reviews – including return visits to entities that failed to meet state goals, standards, and requirements; and other reviews as appropriate. This is an estimated schedule to assist states in planning. States may indicate “no review” for entities the state does not plan to monitor in the performance period.

CSBG Eligible Entity	Monitoring Type (Full-Onsite, Newly Designated, Follow-up, Other, No Review)	Review Type (Onsite, Desk Review)	Target Quarter (FY1 Q1, FY1 Q2...FY2 Q2, FY2 Q2...)	Start Date of Last Full Onsite Review	End of Last Full Onsite Review
AREA FIVE	Full Onsite	Onsite	FY1,Q1	8/7/2018	12/7/2018
AREA IV	Full Onsite	Onsite	FY2,Q3	4/9/2019	5/29/2019
CFS	Full Onsite	Onsite	FY1,Q2	6/27/2018	10/15/2018
CAGI	No Review			4/28/2020	In Progress
CANI	Full Onsite	Onsite	FY1,Q4	9/25/2018	11/28/2018
CASI	No Review			7/28/2020	In Progress
CAPWI	Full Onsite	Onsite	FY1, Q3	7/24/2017	8/31/2018
CAPE	Full Onsite	Onsite	FY2,Q3	7/30/2019	10/8/2019
TRICAP	Full Onsite	Onsite	FY1,Q4	10/23/2018	1/4/2019
HUEDC	Full Onsite	Onsite	FY2,Q3	4/30/2019	7/22/2019
HSI	Full Onsite	Onsite	FY1,Q1	3/13/2018	7/5/2018
ICAP	No Review			11/13/2018	2/4/2019
JS	No Review			6/23/2020	In Progress
LHDC	Full Onsite	Onsite	FY2,Q4	10/22/2019	11/18/2019
NCCAA	Full Onsite	Onsite	FY2,Q3	5/21/2019	6/25/2019
NWICA	Full Onsite	Onsite	FY2, Q4	7/9/2019	10/1/2019
OVO	Full Onsite	Onsite	FY2,Q4	9/10/2019	11/1/2019
REAL	Full Onsite	Onsite	FY1,Q4	7/17/2018	8/31/2018
SCCAP	No Review			5/19/2020	In Progress
SIEOC	Full Onsite	Onsite	FY1,Q3	6/5/2018	9/10/2018
PACE	Full Onsite	Onsite	FY1,Q3	4/3/2018	5/4/2018
WICAA	Full Onsite	Onsite	FY1,Q2	6/4/2019	11/27/2019

10.2. Monitoring Policies: Provide a copy of state monitoring policies and procedures by attaching and/or providing a hyperlink. See attached 2020 CAR Tool

10.3. Initial Monitoring Reports: According to the state's procedures, by how many calendar days must the state disseminate initial monitoring reports to local entities? 30 calendar days

10.4. Closing Findings: Are state procedures for addressing eligible entity findings/deficiencies, and the documenting closure of findings included in the state monitoring protocols attached above? Yes

10.5. Quality Improvement Plans (QIPs). Provide the number of eligible entities currently on QIPs, if applicable: 2

10.6. Reporting of QIPs: Describe the state's process for reporting eligible entities on QIPs to Section 10 27 the Office of Community Services within 30 calendar days of the state approving a QIP? [Narrative, 5000 characters]

- 2020 Response: The Office of Community Services (OCS) is notified within 30 days of IHCD's Division of Community Programs approving a community action agency's (CAA) quality improvement plan (QIP). OCS receives a copy of the IHCD CSBG Monitoring Report, IHCD Onsite Monitoring Completion letter which provides the official QIP notification to the CAA, and the IHCD CSBG QIP Acceptance letter that begins the CAA's corrective action process. IHCD has briefed our CSBG Project Officer regarding the current QIP process.

10.7. Assurance on Funding Reduction or Termination: The state assure that "any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b)" per Section 676(b)(8) of the CSBG Act. Yes

10.8 Eligible Entity Designation: Do the state CSBG statute and/or regulations provide for the designation of new eligible entities? No

10.8b. New Designation Procedures: If no, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public.

- 2020 Response: The Community Action Agencies were initially designated by the Governor of Indiana. IHCD would need to collaborate with the Governor of Indiana on a formal process that would designate a new Community Action Agency.

10.9. Eligible Entity Termination: Do state CSBG statute and/or regulations provide for termination of eligible entities? No

10.9b. Termination Procedures: If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public.

- 2020 Response: Indiana follows the federal process for termination as provided by the OCS IM116.

10.10. Eligible Entity Re-Designation: Do the state CSBG statute and/or regulations provide for re-designation of an existing eligible entity? No

10.10b. Re-Designation Procedures: If no, describe state procedures for re-designation of existing eligible entities and how the procedures were made available to eligible entities and the public.

- 2020 Response: There is currently no process for re-designation for the Community Action Agencies. CAAs remain in their status unless terminated, voluntarily relinquished, or ceased operations.

10.11. Fiscal Controls and Accounting: Describe how the state's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a).

[Narrative, 5000 Characters]

- 2020 Response: Indiana Housing and Community Development Authority has fiscal control and accounting procedures necessary to assure the proper disbursement of and accounting for federal funds. The funding for each eligible entity is determined by IHCD using a funding formula. As a part of the contract process, IHCD's Community Programs Department reviews and approves a budget for each eligible entity, which projects the amounts to be expended for administrative and program activities; the amount an agency can spend on administrative costs is capped at a percentage provided in their contract. Those contracts and budgets are then entered into IHCD's claims system for tracking. IHCD's Financial Operations department is responsible for reviewing claims that are made against those budgets before funds are made available to the agency; the Community Programs Manager for CSBG and Community Programs Fiscal Monitor assists as necessary, especially when new guidance on allowable expenses has recently been posted. Claims can only be submitted on a reimbursement basis, using supporting documentation such as general ledgers and receipts; IHCD does not provide cash advances. Claims are also limited to the amounts set by the eligible entities budget; eligible entities cannot claim for more than they are allowed by their contract and budget. The Community Programs Fiscal Monitor joins the CSBG Program Monitor for on-site visits to review claims and further ensure funds have been used appropriately. IHCD assures that the cost and accounting standards of the Office of Management and Budget are accurately applied to IHCD and the Sub-grantees that receive CSBG funding. IHCD's Accounting Department maintains a separate bank account for CSBG monies and it has its own unique Chart of Accounts to record that specific programs activities. IHCD prepares an individual balance sheet and income statement monthly for this program as well as consolidated statements for all IHCD programs and activities. IHCD uses an independent auditor who completes a program audit as well as a financial statement audit. Appropriate books, documents, papers and records are available to the Secretary and the Controller General of the United States or any authorized representatives to examine, copy or mechanically reproduce any and all related documents upon reasonable request for the items.

10.12. Single Audit Management Decisions: Describe state procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521. [Narrative, 5000 Characters]

- 2020 Response: IHCDCA has an Internal Auditor on staff to collect and review A-133 Single Audits. During that review, the Internal Auditor looks specifically at certain ratios to test the viability/stability of the recipient, the Independent Auditor's Report, notes to the audited financial statements, SEFA, compliance Reports, Schedule of Findings and Questioned Costs, Reoccurring Financial Statement issues, findings specifically linked to IHCDCA's programs and the Summary Schedule of Prior Audit Findings. If Findings are identified within the report that relate to CSBG or any other federal program that IHCDCA subawards, a Management Decision Letter (MDL) may be issued, depending on the Findings and an agency's response; if an MDL is issued, it is within six-months of the audit report being accepted by the Federal Audit Clearinghouse. Any issued MDL will clearly state whether or not the audit finding is sustained, the reasons for the decision, and the expected auditee action to repay disallowed costs, make financial adjustments, or take other action. If the auditee has not completed corrective action, a timetable for follow-up should be given. The MDL will also describe any appeal process available to the auditee.

10.13. Assurance on Federal Investigations: The state will "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act. Yes

10.14. Performance Management Adjustment: Describe any adjustments the state made to monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [Narrative, 2500 Characters]

- 2020: Prior to implementing a revised monitoring tool, the Indiana network is provided a thirty-day comment period. The State of Indiana CAR monitoring process utilizes the CSBG Organizational Standards (IM-138), state and federal codes, IHCDCA knowledge, previous monitoring experience, and best business practices. In addition, Indiana monitors fiscal management, performance metrics, allocation, procurement and accounting to determine solvency, all based on industry standards and best practices. We also utilize an annual risk assessment where outcomes result in determining any additional requirements for monitoring. The State CSBG monitoring has implemented a scoring system so each agency receives an overall monitoring performance score. This accountability measure provides the ability to track data such as statewide performance, specific standards that are not met, and the percentage of eligible entities that met the organizational standards during the performance period. It also allows for IHCDCA to review how the agency meets state standards and implements their CSBG contractual obligations. The monitoring results are also the base information utilized for any Technical Assistance Plans and Quality Improvement Plans for eligible entities not meeting the standards during the performance period. Overall, Organizational Management and Organizational Analysis standards are designed to ensure CSBG eligible entities have appropriate organizational capacity to deliver services to low-income individuals in their communities. In 2020, the revised CSBG CAR Monitoring Tool eliminated six (6) standards, consolidated four similar standards into two and added four (4) standards were added. Finally, seven (7) standards that were guidance or part of multiple criteria within a 2018

standard were broken out or moved, in order to better define a expectation of the standard and provide greater opportunity for agencies to meet the objective.

DRAFT

SECTION 11 Eligible Entity Tripartite Board

11.1. Tripartite Board Verification: Verify which of the following measures are taken to ensure that the state verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act[Check all that applies and narrative where applicable]

- Attend Board meetings
- Organizational Standards Assessment
- Monitoring
- Review copies of Board meeting minutes
- Track Board vacancies/composition
- Other

11.2. Tripartite Board Updates: Provide how often the state require eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc., [Select one and narrative where applicable]

- Annually
- Semiannually
- Quarterly
- Monthly
- As it Occurs
- Other

11.3. Tripartite Board Representation Assurance: Describe how the states will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act. [Narrative, 2500 Characters]

- 2020 Response: The Indiana CSBG Comprehensive Administrative Review Monitoring Tool requires each community action agency (CAA) to maintain within its bylaws a Petition for Adequate Representation. The purpose is to establish procedures for low-income individuals or organizations who feel they may be disenfranchised by the CAA to be able to petition for more low-income individual's participation on the tripartite governing board. The Bylaws are reviewed during each CSBG CAR monitoring for Petition for Adequate Representation.

11.4. Tripartite Board Alternative Representation: Does the state permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the state to assure decision-making and participating by low income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act. No

SECTION 12 Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility: Provide the income eligibility threshold for services in the state. [Check one item below.]

- 125% of the HHS poverty line
- X% of the HHS poverty line (fill in the threshold): 200%
- Varies by eligible entity

12.1a. Describe any state policy and/or procedures for income eligibility, such as treatment of income and family/household composition. [Narrative, 5000 Characters]

- 2020 Response: There is no state policy or procedure for determining income eligibility; agencies are allowed to create and follow their own. CSBG funded programs often utilize income verification processes from other federally funded programs such as Energy Assistance, Head Start and Housing Choice Voucher. CAAs use their own client intake forms to determine income eligibility for local programs.

12.2. Income Eligibility for General/Short Term Services: Describe how the state ensures eligible entities generally verify income eligibility for those services with limited in-take procedures (where individual income verification is not possible or practical). An example of these services is emergency food assistance. [Narrative, 5000 Characters]

- 2020 Response: As a part of the annual Community Action Plan, eligible entities must describe their policies for verifying income eligibility for those services with limited in-take procedures. IHCD reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity. Starting with the 2021 Community Action Plan, IHCD will begin asking for written income verification policies as Plan attachments.

12.3. Community-targeted Services: Describe how the state ensures eligible entities' services target and benefit low-income communities for those services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations). [Narrative, 5000 Characters]

- 2020 Response: As a part of the annual Community Action Plan, eligible entities must describe how they ensure their services target and benefit low-income individuals, even when those services provide a community-wide benefit. IHCD reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity. IHCD will also review those services, and ask for additional information as necessary, when they are included in the Annual Report Module 3.

SECTION 13 Results Oriented Management and Accountability (ROMA) System

13.1. Performance Measurement System: Identify the performance measurement system that the state and all eligible entities use, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act.

- The Results Oriented Management and Accountability (ROMA) System
- Another performance management system that meets the requirements by Section 678E(b) of the CSBG Act
- An alternative system for measuring performance and results

13.1a. ROMA Description: If ROMA was chosen in Item 13.1, describe the state's written policies, procedures, or guidance documents on ROMA. [Narrative, 5000 characters]

- 2020 Response: The State of Indiana participates in the ROMA system by monitoring agency activity of the three national goals and NPI's, as outlined in the monitoring manual. Several standards that agencies are monitored on explicitly refer to the ROMA cycle (assessment, planning, implementation, achievement of results, and evaluation), and in several cases agencies are encouraged or required to use a ROMA-certified trainer or implementer in the development in their policies and procedures. All agencies are required to submit an annual CSBG Annual report that includes ROMA data and an annual Community Action Plan that links agency programs to the ROMA cycle.

13.2. Outcome Measures: Indicate and describe the outcome measures the state will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act. [Select one and Narrative, 5000 characters]

- 2020 Response: IHCD uses the National Performance Indicators, as provided in the CSBG Annual Report Modules 3 & 4. IHCD specifically uses the NPIs from Module 4 in the Community Action Plan, by having eligible entities set NPI (as well as service) targets in the Action Plan, which are then reported on in the Annual Report.

13.3. Eligible Entity Support: Describe how the state supports the eligible entities in using ROMA or an alternative performance management system. [Narrative, 5000 characters] Note: The activities described under Item 13.3 may include activities listed in "Section 8: Training and Technical Assistance." If so, mention briefly, and/or cross-reference as needed. This response will also link to the corresponding assurance, Item 14.12.

- 2020 Response: IHCD supports ROMA Training with CSBG Discretionary funds on an annual or biennial basis, as requested by the state network. Currently, there are 5 ROMA-certified trainers and 1 ROMA-certified implementer.

13.4. Eligible Entity Use of Data: Describe how the state plans to validate that the eligible entities are using data to improve service delivery. [Narrative, 5000 characters]

- 2020 Response: As a part of the annual Community Action Plan, eligible entities must identify the community needs (as supported by needs assessment data) that their

services address. Additionally, agencies must provide specific examples of changes they made in the past year to improve service delivery and enhance impact for individuals, families, and communities with low incomes. IHCD reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity.

13.5. Community Action Plan: Describe how the state will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act. [Narrative, 5000 characters]

- 2020 Response: Indiana runs on a January-December program year for CSBG. Each September, IHCD posts a template Community Action Plan for the upcoming program year, which is then due in November. The Plan generally asks about each agency's programs, their plans to meet certain assurances, and their training needs. A number of attachments are also included as a part of the plan, such as an annual tracking form for each agency's board membership/attendance. After review of each initial submission, IHCD works with agencies to make any necessary updates prior to the start of the program year on January 1.

13.6. Community Needs Assessment: Describe how the state will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act. [Narrative, 5000 characters]

- 2020 Response: As a part of the annual Community Action Plan, agencies must identify which needs from their most recent Community Needs Assessment are being addressed by specific services. Starting with the 2021 Community Action Plan, each agency will provide the full version of their most recent Community Needs Assessment for IHCD to review, to ensure agencies are fully utilizing their needs assessments to identify and fill gaps in services.

SECTION 14: CSBG Programmatic Assurances and Information Narrative

14.1a Describe how the state will assure "that funds made available through grant or allotment will be used (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--

- (i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
- (ii) to secure and retain meaningful employment;
- (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
- (iv) to make better use of available income;
- (v) to obtain and maintain adequate housing and a suitable living environment;
- (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
- (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to
 - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
 - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

- 2020 Response: IHCD reviews the Community Action Plan that each eligible entity submits to ensure that the services the agency plans to provide in the coming year match the services outlined in the CSBG Act; the agency's Annual Report is later reviewed to ensure those services were implemented as planned. IHCD also utilizes a reimbursement process for claims, to further ensure that CSBG funds are used for activities outlined in the Act.

14.1b Describe how the state will assure "that funds made available through grant or allotment will be used (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--

(i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and

(ii) after-school child care programs.

- 2020 Response: IHCD reviews the Community Action Plan that each eligible entity submits to ensure that the services the agency plans to provide in the coming year match the services outlined in the CSBG Act; the plan includes a question specifically about the agency's services that focus on youth development. IHCD reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity. The agency's Annual Report is later reviewed to ensure those services were implemented as planned. IHCD also utilizes a reimbursement process for claims to further ensure that CSBG funds are used for activities outlined in the Act.

14.1c Describe how the state will assure "that funds made available through grant or allotment will be used to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including state welfare reform efforts)

- 2020 Response: As a part of the annual Community Action Plan, eligible entities must identify the programs that CSBG funds support as well as the programs that agencies manage in general (with or without CSBG support) that they may refer CSBG clients to. Agencies must also list community partnerships and how they coordinate with those partners so CSBG clients can make use of those programs, and so that duplication of services can be avoided. IHCD reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity.

14.2 [No response; links to items 7.9 and 7.10.]

14.3a Describe "the service delivery system, for services provided or coordinated with funds made available through grants made under 675C(a), targeted to low-income individuals and families in communities within the state;

- 2020 Response: Indiana has 22 CSBG Eligible Entities that provide direct services and service referrals to low-income individuals and families. All 92 counties in the state are served by an eligible entity; funding awards are determined based (in part) on the number of counties an entity serves and on the percentage of the state's low-income population that are within those counties based on the most recent decennial census data.

14.3b [No response; links to items 7.9 and 7.10.]

14.3c [No response; links to 9.7]

14.3d Describe "how the local entity will use the funds [made available under Section 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting."

- 2020 Response: Some eligible entities make CSBG funds available to local partners that are implementing innovative initiatives. But most agencies focus their funds on their own innovative initiatives, which address needs identified in their most recent Community Needs Assessments. Some such initiatives have included developing affordable housing that involves solar energy (to reduce resident energy bills) and comprehensive wrap-around services; a community loan center to offer an alternative to predatory lending; and a food truck whose profits go towards a senior meal service.

14.4 Describe how the state will assure "that eligible entities in the state will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals."

- 2020 Response: As a part of the annual Community Action Plan, eligible entities must identify whether or not they offer or refer to services that provide, on an emergency basis, supplies, nutritious foods and related services that counteract the conditions of starvation and malnutrition among low-income individuals.

14.5 [No response; links to items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b]

14.6 [No response; links to 9.2 and 9.5]

14.7 [No response; links to 10.13]

14.8 [No response; links to 10.7]

14.9 [No response; links to 9.6]

14.10 [No response; links to item 11.3]

14.11 [No response; links to items 13.5 and 13.6]

14.12 [No response; links to 13.1, 13.2, 13.3, and 13.4]

14.13 [No response for this item]